

1 example, Monsanto, and if they are using -- or Ashland Oil,  
2 and they are using that as an emergency frequency, they can  
3 live with it, sir.

4 Q Mr. Raymond, I just want to understand why if it was  
5 possible for you to coordinate and not cause interference to  
6 customers on 152.48, why would you not have been able to  
7 coordinate and not interfere with Union Carbide's operations?

8 A Well, maybe you didn't hear the first time I  
9 answered. I said I didn't say that there was interference or  
10 there would be. If you coexist there is no interference. I'm  
11 talking about at time delay. When there's -- when there is an  
12 explosion at that plant, believe me, my family lives in that  
13 town. I want them to go that quick. Maybe it was a bad  
14 decision for Union Carbide to do this. But when they got this  
15 license, and I'm under the understanding about 20 years ago,  
16 no one else was using, there wasn't PCPs and so forth  
17 available.

18 Q Mr. Raymond, I mean, one of your salespeople has  
19 testified that you're providing service to ambulance companies  
20 on 152.48 and RAM people have certainly testified that. So,  
21 it's not as if these safety concerns that you're talking about  
22 are unique to 157.74, are they, Mr. Raymond?

23 MR. HARDMAN: Your Honor, I'm going to object to the  
24 question.

25 JUDGE CHACHKIN: Sustained. He's given his reasons.

1 He did point out that aside from anything else that it's one  
2 of their -- it's their biggest customer and they certainly  
3 don't want to upset them.

4 BY MR. JOYCE:

5 Q But you weren't concerned about upsetting anybody  
6 else's customers on 152.48, Mr. Raymond?

7 A I didn't say that, sir. I said you can coexist.  
8 It's kind of like -- no, never mind. Go ahead.

9 Q During this time period, 1989 to '90, how many local  
10 paging companies -- or could you identify for me the other  
11 local paging companies in Huntington and Charleston?

12 A No.

13 Q You have absolutely no idea who your competition  
14 was?

15 A I know that American Mobilephone was there. I don't  
16 know -- I mean -- and Mr. Moyer was, was in operation at some  
17 time there.

18 Q Okay.

19 A There could -- I'm sure there -- there are several,  
20 several more.

21 Q So, perhaps three others?

22 A I can't answer, sir. I just know there, there are  
23 others.

24 Q Could we -- it's, it's important because this is  
25 germane to your direct testimony that we get a handle on how

1 many paging companies are out there, Mr. Raymond. Is it  
2 between one and five?

3 A Sir, I, I really -- you're asking me to go back five  
4 years -- as long as five years ago to tell you how many paging  
5 companies -- and, you know, every little electronic guy,  
6 electronic shop, they put in paging too. I, I don't know.  
7 That would be like asking me how many trophy shops are in  
8 Charleston. I don't know, sir.

9 Q Would you agree that it's less than five?

10 A No, sir, I can't.

11 Q Is it between five and ten?

12 A No, sir, I, I don't know.

13 Q Now, RAM wasn't an RCC paging company back then was  
14 it?

15 A I have no idea. Mr. Moyer told me he was an RCC or  
16 would testify -- I don't know when he became one.

17 Q And you were operating on one RCC channel at that  
18 time, 1989, 1990?

19 A Two.

20 Q Two?

21 A Are -- we are talking paging?

22 Q RCC channels. I'm sorry. I'm being specific.

23 A Well, we, we have mobile frequencies as well as  
24 paging frequencies.

25 Q Okay, and what was your mobile frequency?

1           A     We have Channel 1, Channel 7, Channel 13 and Channel  
2 5. Maybe not all those within the same area. And then of  
3 course, our, our two RCC paging frequencies.

4           Q     You claim at page 4 of your direct testimony that  
5 there, "was almost no chance that a suitable frequency would  
6 be available for Charleston and Huntington under Part 1-2 of  
7 the FCC's rules." Correct?

8           A     That is correct, sir, that one would be applicable  
9 and suited for us.

10          Q     But you heard Mr. Moyer testify that there were  
11 probably 50 to 70 RCC channels available?

12               MR. HARDMAN: I object, Your Honor. That was not  
13 the witness Moyer's testimony.

14               MR. JOYCE: You can clarify it if you wish,  
15 Mr. Hardman. That's my recollection.

16               JUDGE CHACHKIN: Well, I'll sustain the objection.  
17 If you want to ask a question you don't have to preface it by  
18 saying what someone else testified to. That's their  
19 testimony.

20               BY MR. JOYCE:

21          Q     Mr. Raymond, earlier in the week Mr. Moyer testified  
22 to my recollection that there were probably --

23               JUDGE CHACHKIN: It's irrelevant what Mr. Moyer  
24 testified. Ask your question as to what he knows.

25               BY MR. JOYCE:

1 Q Well, I presume you made that statement on the basis  
2 of your knowledge of how many RCC channels are available in  
3 that area, correct?

4 A Which statement are you talking about? You --

5 Q The one that says, "There is almost no chance that a  
6 suitable frequency would be available for Charleston and  
7 Huntington under Parts 1-2 of the rules." Correct?

8 MR. HARDMAN: Could I have a page reference?

9 JUDGE CHACHKIN: Page 4.

10 MR. JOYCE: Page 4.

11 MR. HARDMAN: Thank you.

12 MR. RAYMOND: Well, if, if we could go on and finish  
13 reading that paragraph I think it may explain it, sir.  
14 Page 4, that paragraph. I did not consider it at the time  
15 because there was almost no chance of a suitable frequency  
16 that -- available in Charleston and Huntington under the  
17 Part 22 and that licensing part which I'd earlier testified  
18 today takes so very long and it is so very expensive, and then  
19 once again we're going to the West Virginia Public Service  
20 Commission. So --

21 BY MR. JOYCE:

22 Q Okay, but I'm not asking you about the, the second  
23 part of --

24 A All right.

25 Q -- your answer, Mr. Raymond, and I appreciate that

1 clarification. I'm simply asking you about your knowledge of  
2 how many RCC frequencies are available in Charleston and  
3 Huntington.

4 A I cannot answer that. I don't -- I couldn't tell  
5 you.

6 Q You have no idea?

7 A I haven't done a data -- for a while, no, sir, I  
8 have no idea.

9 Q Well then, how would you be able to say that there  
10 is almost no chance that a suitable frequency would be  
11 available, Mr. Raymond? I don't understand that.

12 A Are you talking about then, now? I'm taking your  
13 question as now. Back then?

14 Q Back then when you applied for this 152.48 you're  
15 telling us now that one of the reasons was that there was no  
16 suitable RCC Part 22 frequency. That's your testimony --

17 A That is correct.

18 Q Okay.

19 A That is correct.

20 Q But now you're telling me that you have no idea how  
21 many RCC channels were available?

22 A No, I said today. I'm sorry, I misunderstood your  
23 question.

24 Q Okay.

25 A I, I even came back and explained it if you need --

1 Q I see.

2 A -- to hear it again. As of today, I don't know. As  
3 of then, there were not one that were suitable for us at that  
4 time that we felt --

5 Q My question was, how many RCC frequencies were  
6 available for one-way paging back in 1989 and 1990?

7 A I have no idea right today how many was available at  
8 that time.

9 Q That's not my question, Mr. Raymond. Back then --

10 A I have no idea today how many were available back  
11 then. I can't remember. I'll answer it that way.

12 Q But you must have gone back over your notes or  
13 something when you prepared this direct testimony,  
14 Mr. Raymond.

15 A Um-hum. Yes, sir.

16 Q That's a yes?

17 A That is a yes, uh-huh.

18 Q All right. So, what is the basis for your assertion  
19 that back in 1989 and 1990 there was almost no chance that a  
20 suitable frequency would be available under  
21 Part 22 of the rules?

22 A Because that's what my -- I had in my notes, sir.

23 Q What is the basis of you understanding that there  
24 were no RCC channels available for one-way paging back then?

25 A I --

1 Q Did you do a frequency study?

2 A We had a frequency check done in that area, yes,  
3 sir.

4 Q I presume you haven't produced that as part of your  
5 direct testimony.

6 A No. You, you have my direct testimony. No, sir.  
7 No.

8 Q Okay, and that frequency study showed that there  
9 were no RCC channels available?

10 A I didn't say no. I said desirable.

11 Q What is a desirable frequency, Mr. Raymond?

12 A Well, we did not want a 800 or 900 meg, needless to  
13 say. We don't want a real low, low number because of the  
14 terrain and geographic, Charleston, West Virginia and  
15 Huntington and the mountainous regions.

16 Q A low number being 35 MHz, I presume you mean?

17 A That we, that we did not want to go anything in the  
18 20s and 30 MHz.

19 Q So, you were looking for something in the 150s?

20 A Preferably, yes, sir.

21 MR. JOYCE: May I approach the witness?

22 JUDGE CHACHKIN: Yes.

23 BY MR. JOYCE:

24 Q Mr. Raymond, I want to show you from the FCC rules,  
25 Part 22, Section 501, a listing of frequencies available for



1 one-way -- mobile service.

2 MR. HARDMAN: I object, Your Honor. That's an  
3 improper characterization of the rule. The rule says those  
4 are the frequencies available for assignment. It doesn't say  
5 they're available.

6 MR. JOYCE: I'll accept Mr. Hardman's  
7 characterization. May I ask my question?

8 BY MR. JOYCE:

9 Q Mr. Raymond, do you see this list here?

10 A Um-hum.

11 Q All right. There's one, two, three, four, five,  
12 six, seven, eight, nine, ten, eleven, twelve, thirteen,  
13 fourteen, fifteen, sixteen, seventeen, eighteen frequencies  
14 that would appear to meet your criteria. Isn't that correct?

15 A Yes, sir.

16 MR. HARDMAN: I, I object, Your Honor. Improper  
17 characterization of the, of the, of the question that he  
18 propounded. What he said in his answer was to meet your  
19 criteria, and the issue was are these frequencies available.  
20 And I, I would ask that the foundation be established as to  
21 whether the frequencies stated in the rule are in fact  
22 available that is not assigned to someone else within the  
23 interference area of the Charleston/Huntington area. And that  
24 would save us an awful lot of time.

25 MR. JOYCE: We don't need to do that. I can move

1 on.

2 BY MR. JOYCE:

3 Q Mr. Raymond --

4 JUDGE CHACHKIN: No, I, I think that's crucial. I  
5 mean, if it wasn't available for assignment within --  
6 interference-free area, then what's the point?

7 MR. JOYCE: Well, it's his assertion --

8 JUDGE CHACHKIN: All you said, these are the, these  
9 are the frequencies it shows there. But what, what does that  
10 establish? Are you saying that there were frequency --

11 MR. JOYCE: That, that's all that I want -- that's  
12 all that I'm asking him, Your Honor, is whether or not those  
13 frequencies -- how many there were in that area. I haven't  
14 asked him --

15 JUDGE CHACHKIN: But -- said a suitable frequency  
16 would be available for Charleston and Huntington under Part 22  
17 of the FCC rules. You haven't established that there were  
18 suitable frequencies there.

19 MR. JOYCE: All right. I'll --

20 JUDGE CHACHKIN: I assume --

21 MR. JOYCE: -- rephrase my question.

22 BY MR. JOYCE:

23 Q Mr. Raymond, there would appear to be 18 152 MHz RCC  
24 paging frequencies. Isn't that correct?

25 A Not by the book. I think one of them was a 450,

1 your very last one you pointed to, sir. I think it was  
2 4504.025 --

3 Q Yes, but I didn't count that one.

4 A I'm sorry. Now, if you'd please ask me the question  
5 again.

6 Q My question to you is simply, there would appear to  
7 be 18 152 MHz paging frequencies, correct?

8 A Sure.

9 Q All right.

10 JUDGE CHACHKIN: Now, wait a minute.

11 BY MR. JOYCE:

12 Q And now --

13 JUDGE CHACHKIN: Were they suitable? And were they  
14 suitable?

15 MR. RAYMOND: Some of them belonged to us already.  
16 I mean, we were using a lot of them. And American  
17 Mobilephone, I think I saw there, you know. So, they are  
18 being used.

19 BY MR. JOYCE:

20 Q So, that's two companies you've mentioned?

21 A Yes. We had -- well --

22 JUDGE CHACHKIN: Well, what did you mean when you  
23 said there was no, there was no chance that a suitable  
24 frequency would be available -- Charleston and Huntington?  
25 What did that mean? What do you mean by that?

1           MR. RAYMOND: We could not find any in the contour  
2 that would allow us to do the local paging and yet be able to  
3 build and expand on it at the same token. I think maybe you  
4 took -- have taken this out of context and since the Judge  
5 asked me I'll, I'll go on. With 152.480, we could start with  
6 a small area, high-power, nationwide paging and extend our  
7 areas for us. I mean, we're getting Charleston and  
8 Huntington. We started this thing out small with hopes to  
9 expand on it into our other markets such as Parkersburg,  
10 Sissonsville, Ripley, Point Pleasant, Logan, Beckley, under  
11 one simulcast system. All of those frequencies that you  
12 showed me in that book could not be built into that large of a  
13 spectrum so we would have been confined to the area. We were  
14 looking for a local paging budget frequency. Now, but see, we  
15 don't plan what we're going to do today. We try as any good  
16 business would to look down the road at the future what that  
17 may happen. If we went with an RCC frequency, and even  
18 forgetting -- taking aside the regulations, we could not  
19 expand that into a very large paging area because we would  
20 have ran into other paging companies with that frequency in  
21 the areas that we would have liked to have expanded into.  
22 That was my whole definition of suitable. I'm sorry if it  
23 took this long to get around to it, sir.

24           BY MR. JOYCE:

25           Q     Let me take a few of these things one at a time, Mr.

1 Raymond. You're not saying that there are some technical  
2 distinctions between each of these 152 MHz channels are you?

3 A I don't even understand what you're talking --

4 Q All right. Well, you've mentioned a few things in  
5 your answer that I want to clarify. There's no particular --  
6 from a paging operational perspective there's no difference  
7 between 152.48, and I'm not getting into your networking  
8 business yet, okay?

9 A Um-hum.

10 Q But from an operational perspective, isn't it true  
11 that there's no difference between 152.48 and 152.03, .06,  
12 .09, .12, .15, etc., etc., correct?

13 A Not under my understanding. I think there's quite a  
14 bit of difference, sir.

15 Q What is the difference?

16 A 152.48 is a private-carrier system that I can apply  
17 for a license --

18 Q All right.

19 A -- anywhere that I want to.

20 Q Mr. Raymond, I'm sorry, I'm going to have to  
21 interrupt because you're not answering my question. I'm not  
22 getting into the regulatory distinctions. I just want to  
23 focus for now on technical, operational characteristics of  
24 these frequencies for lay people, okay? Just so we understand  
25 each other.

1           A     I'm not the most technical person in the world, but  
2 I'll try.

3           Q     Okay, but you're the one who has testified that  
4 these frequencies were unsuitable to you so that's what we're  
5 trying to figure --

6           A     That's correct.

7           Q     -- out why you made that determination and I got to  
8 take it a step at a time --

9           A     Okay.

10          Q     -- based on your answer, okay?

11          A     All right, sir.

12          Q     I'm not talking about regulatory differences between  
13 PCPs and RCCs, okay? So put that aside.

14          A     Okay.

15          Q     And I'm not talking about whether or not you can  
16 only network on a PCP frequency and you can't on an RCC  
17 because we're going to get back to that, okay? So, put that  
18 aside.

19          A     Okay, sir.

20          Q     All right? Now, you've told me that low-band  
21 frequencies I believe they're referred to, 35 MHz, were  
22 unacceptable in your area because I understand there are  
23 certain characteristics of those frequencies, they just don't  
24 propagate as well as other frequencies. Is that fair to say?

25          A     As explained to me, yes, sir.

1           Q     All right, but it's also my understanding, and I  
2 didn't see any distinction in your direct testimony, that this  
3 block of frequencies which are referred to as VHF frequencies,  
4 the 152, that they share the same properties. Is that fair to  
5 say?

6           A     The properties of -- as --

7           Q     Of being able to transmit over mountainous areas, to  
8 cover a larger service area.

9           A     That is my understanding, yes.

10          Q     All right. So, with that in mind and that only,  
11 your understanding is that there's no difference between these  
12 VHF frequencies and 152.48. Is that fair to say? Just the  
13 propagation characteristics, okay?

14          A     Just on the paging ranges and so forth?

15          Q     Correct.

16          A     I would -- under my understanding, I would agree  
17 with you, yes, sir.

18          Q     All right. So, to get back to my original question,  
19 if you're looking for an RCC frequency for propagation  
20 characteristics alone, these frequencies would have met your  
21 purposes, is that fair to say, if they were available. And  
22 I'm not going to quarrel with Mr. Hardman. If they were  
23 available in your area?

24          A     If they were available to where we would -- our  
25 company had decided for the future to go, yes, sir.

1 Q All right.

2 A Minus the regulations and all. Am I understanding  
3 you correctly?

4 Q And you haven't submitted a frequency study here,  
5 and you haven't told me of any paging companies other than  
6 American Mobilephone, so I have no evidence here from you to  
7 show that those frequencies were not available in those areas  
8 where you planned on providing service.

9 MR. HARDMAN: Your Honor, I'm going to, I'm going to  
10 object again. If you go back to what the, the witness's  
11 direct testimony was, doesn't say that there absolutely were  
12 no frequencies available. What he said was, because -- was  
13 that he didn't seriously consider it because there was almost  
14 no chance. Now, and that's -- and if we're spending all this  
15 time picking that sentence apart, I have to question  
16 relevance.

17 MR. JOYCE: Well, it's only because when I ask  
18 simple questions I get very broad answers. So --

19 MR. HARDMAN: Well, the problem is that the  
20 questions have a tendency to have non sequiturs in them and  
21 trying to piece apart, you know, where the logical form of the  
22 question was is consuming a lot of time.

23 MR. JOYCE: I think your witness is doing very well,  
24 Mr. Hardman --

25 MR. HARDMAN: So do I.



1 MR. JOYCE: -- without your assistance.

2 BY MR. JOYCE:

3 Q All right. Now, regulatory distinctions. You  
4 testified in your, in your direct at page 4 that you could get  
5 a PCP license quicker than an RCC and that's consistent with  
6 other testimony we've -- well, I won't get into other  
7 testimony. But that's your testimony isn't it, Mr. Raymond?

8 A Yes, sir.

9 Q All right, but now you already had an RCC paging  
10 license at that time, correct?

11 A That is correct, sir.

12 Q Okay. So, I guess I'm confused about what your rush  
13 was in getting this PCP license.

14 A I don't understand what you mean by our rush.

15 Q Well, again, I'm trying to understand your  
16 explanations as to why you wanted the 152.480 frequency and  
17 you mentioned one of them is speed of -- licensing speed, of  
18 processing which no one is going to quarrel with you that you  
19 can get a PCP license quicker than an RCC.

20 A That is correct, sir.

21 Q So, it's just a straightforward question. I'm  
22 asking you what your rush was.

23 A Our rush to gain a private-carrier paging system,  
24 okay, as I earlier testified, in 1989 we were 40-some percent.  
25 So, maybe you can see that I have a lot of energy within me.

1 That was the largest growth in the history of the company for  
2 over 30-some years. To get something done, to get something  
3 started to what were going to try to do in 1990, our  
4 projections on where we wanted to be, what we wanted to do, to  
5 supply a local paging frequency, a budget paging frequency.  
6 Because Mr. Moyer -- or excuse me, RAM Paging could have been  
7 the first of many other private-carrier paging companies to  
8 come along and we needed to be able to compete on an equal  
9 basis as I gave you earlier -- you know, apples to apples.

10 Q Okay. If I can fathom your answer, your rush then  
11 is to have a PCP license in place to take care of this demand  
12 for your services? Is that a fair characterization?

13 A I think you're using possibly the wrong term, and  
14 maybe it'll help me -- it's the rush. It wasn't like oh, we  
15 have to get this tomorrow because needless to say we didn't.  
16 And we still continued our growth as so I stated. There  
17 wasn't the rush we needed today. There was the, the idea that  
18 these do not take as long as RCC frequencies, the  
19 coordination, the filings and all these things. Which would  
20 -- if it took off, if it took off, if it was successful, if we  
21 found that there was a big market for budget paging out there,  
22 we could, we could expand it at a much faster rate than we  
23 could expand our RCC services. And they went hand-in-hand,  
24 RCC, private paging. We had our answering service and mobile  
25 phones and fax service. We're a communication company so we

1 try to give a full offering of whatever people wanted. If  
2 that's all they wanted, then we're going to supply it to them  
3 because if we can't then they'll go somewhere else.

4 Q Okay. Mr. Raymond, from what you've told me, I'm  
5 still having trouble -- and humor me please -- understanding  
6 why 152.48 was the best PCP frequency for you. Because  
7 although you, you said it's a high-power one, you didn't  
8 operate your station at high power. Isn't that correct?

9 A That is correct.

10 Q Okay. Now, you're concerned about the growth on  
11 your RCC channel and you got all these services you want to  
12 provide to people, you want to be able to do it in a hurry.  
13 But you're applied for a frequency that's already allegedly at  
14 least very busy. So, it would seem to me that that's going to  
15 impede your growth prospects if you're applying on a frequency  
16 that somebody is already is already using very, very much.  
17 Isn't that true?

18 A No, sir.

19 Q Why wouldn't that be true?

20 A We applied for -- all right, we're kind of  
21 reiterating everything here -- for the high power. Whether we  
22 used it today or tomorrow was not the question. Because we  
23 went into this with a very cautious type look due to some  
24 things. See, this has been brought out what Capitol  
25 supposedly said, that there were some things said to Capitol

1 of what RAM was supposedly going to do. We went into this on  
2 a low cost. Fault us for it and I would have to call someone  
3 a little bit maybe asinine. We were able to get into it with  
4 a very low cost as far as equipment goes. It wasn't high  
5 power. As a matter of fact, Mr. Walker and I talked in the  
6 site, I remember the conversation well, that we need to get a  
7 little bit more high power up here to go ahead if we were  
8 going to continue into this. We went in to test it to see  
9 what we were going to do, to grow and go on, very low cost.  
10 Very low cost to start with.

11 Q Although I'm not sure what that has to do with my  
12 question, I'll, I'll accept your answer for what it's worth,  
13 Mr. Raymond. But that caution was reflected in your operation  
14 of your PCP system, correct?

15 A The cost-containment, yes, sir.

16 Q Right, and the fact is, I mean, you didn't really  
17 load a bunch of customers onto that 152.480 frequency in your  
18 first year of operations, correct?

19 A Yes, that is correct.

20 Q Okay.

21 A That is correct.

22 Q So, that's why I'm getting back to having difficulty  
23 understanding why speed of getting a PCP license was of such  
24 great concern to you since the record reflects that your grown  
25 on that PCP system was, was far from speedy.

1           A     Okay. I understand. I finally got -- maybe --

2           Q     Yeah, I'm sorry. It took a while to get it out.

3           A     That's okay. Because I think all that was outlined  
4 there. We got the, the private-carrier system -- September  
5 was when I believe it was licensed to us. I'm not quite sure,  
6 would have to look. After that, we had considerable amount of  
7 problems coordinating link frequencies with NABER. Maybe you  
8 haven't followed on the testimony and got to it so I'll  
9 explain why we did not have a lot of customers. We had a  
10 transmitter in Charleston, West Virginia, and one in  
11 Huntington, these points. Point A being Charleston, Point B  
12 being Huntington. We could not -- and, and the marketing more  
13 went on in Huntington than it did in Charleston. The terminal  
14 is in Charleston. We could not get our messages from Point A  
15 to Point B due to faulty links which was coordinated three,  
16 four, maybe five times through NABER trying to acquire a clean  
17 link frequency. Once we got on to the Putnam County bus --  
18 NABER coordinated a bus -- the school bus frequency. Well,  
19 that would work good when school wasn't going on, but when  
20 school went on that repeater went up and knocked us down. It  
21 was very unreliable. We were continually having link problem  
22 after link problem. We would put customers on and we would  
23 think, we would work. You know, it was unreliable service due  
24 to not only link, but -- and I don't think we've defined the  
25 definition of harmful interference, so I'm going to use the

1 term when we finally did get a page out getting walked over by  
2 other companies. It was so unreliable. We finally got a link  
3 frequency near the end that worked. I sent to the FCC a very  
4 large docket of agreements that, that we had gone through  
5 on/off, on/off. We lost a lot of customers. It wasn't  
6 Capitol's fault, it wasn't RAM's fault. I don't even know if  
7 it was NABER's fault. All I know is we had terrible link  
8 frequencies and we kept sending them money and coordinating it  
9 and we put it on and it didn't work and we were back to square  
10 one.

11 Q Mr. Raymond, you claim that another reason why you  
12 applied for this particular 152.48 PCP frequency is because  
13 you could network with other carriers on that channel. Is  
14 that correct?

15 A Yes, sir. We were hoping to network. As a matter  
16 of fact, one of the gentlemen at RAM Page's network had called  
17 us and I think he even said something that once we got it up  
18 we were hoping to network.

19 Q Now, the idea of networking is not unique to  
20 private-carrier paging operations is it, Mr. Raymond?

21 A No, sir, it's not. No, it's not. It's much more  
22 expensive -- the RCC industry.

23 Q Why would it be more expensive for an RCC to network  
24 as opposed to a PCP?

25 A A good question. I'd like to know that. We were

1 the very first company, because we were concerned about  
2 nationwide paging. People do want that. We were the first  
3 company in West Virginia to sign up with Skytel, and since  
4 then I think they've changed their name but this was years and  
5 years ago. Because -- this is almost five years, when I first  
6 came, because nationwide paging was coming of age and we were  
7 in the first hundred I think people that signed up with that  
8 company. The only one in West Virginia. And the base rate to  
9 the customer at that time, like \$60 a month. Now, if you  
10 wanted to use your pager it cost you more, but you could carry  
11 it. But it didn't work in West Virginia. There's another bad  
12 thing. Because they had no transmitters in West Virginia, and  
13 up until 18 months, two years ago, they have since then put a  
14 transmitter in Charleston and Huntington. But, you know, this  
15 would require the customer to pay \$60 for Skytel plus the  
16 usage and the 800 numbers and the voice mail when they're away  
17 from home. But when they were home they had to buy -- still  
18 lease another local pager off of us. So you were looking at  
19 \$100, \$150 a month plus for paging at that time. So, if you  
20 can find that answer out, good luck.

21 Q Skytel is -- I take it Skytel is one of -- is a  
22 company that provides RCC networking services?

23 A Yes.

24 Q There are others, I presume.

25 A I don't know -- one called Q Paging that works off

1 of FM radios. It's a station that to my understanding, I'm  
2 not a technician, I, I've heard that doesn't work very well.  
3 We have not found the "national paging" available at an  
4 expense that is comparable with 152.480.

5 Q And then there are local possibilities, local RCC  
6 companies can also network together?

7 A We, we brought that up at an RCC meeting about three  
8 years ago, about putting a TNPP system in and that that is  
9 quite common. Right now, the RCCs seem to more offer numbers.  
10 You know, when you're up in that area we'll give you a local  
11 number. And that is one reason Motorola has come out with a  
12 two-, three-channel pager that you can change channels so when  
13 you go in different area that you would need another number.  
14 So, that person could have the possibility of three numbers on  
15 their pager.

16 Q That Network USA that you referred to, that's a  
17 nationwide 152.480 --

18 A To my understanding.

19 Q -- network? Yeah. Did you know that RAM  
20 Technologies had the exclusive franchise for that --

21 A No.

22 Q -- in your service area?

23 A No, sir, I did not.

24 Q So, you never made those inquiries I take it then?

25 A I knew it was available, that's all. I mean, I, I



1 knew that the nationwide paging was available. What I had to  
2 go through to get it, we never got that far. That was what we  
3 wanted to do, is to offer nationwide paging. But we had to  
4 get it -- once again, please, sir, understand that, that  
5 maybe, maybe we do things the old way, but we kind of take one  
6 step at a time but we want to get up to that top of that  
7 ladder. These were things that we wanted to do, but one step  
8 at a time.

9 Q Sure. And you got your PCP license in September of  
10 1990, right?

11 A Um-hum.

12 Q Okay, and you had it until --

13 A I'm sorry, yes, sir. I'm sorry.

14 Q And you had it until September of 1993, correct?

15 A I'll agree with you, yes, sir.

16 Q Give or take --

17 A Yes, sir.

18 Q Okay, and again, I'm just trying to understand your  
19 direct testimony. You say one of the reasons you applied for  
20 152.48 is because of the networking aspects of the 152.48,  
21 correct?

22 A Yes, sir.

23 Q Okay, but now, in those three years, September 1990  
24 to September 1993, you never bothered to find out whether or  
25 not you could become an affiliate of Network USA. Isn't that